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*Attorneys for HASElect-Medical Receivables  
Litigation Finance Fund International SP*

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:

INFINITY CAPITAL MANAGEMENT, INC.

Debtor.

Case No. 21-14486-abl

Chapter 7

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,

Plaintiff,

v.

TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,

Defendant.

Adversary Case No. 21-01167-abl

**NOTICE OF HEARING ON  
PLAINTIFF HASELECT-MEDICAL  
RECEIVABLES LITIGATION  
FINANCE FUND  
INTERNATIONAL SP'S MOTION  
FOR PARTIAL SUMMARY  
JUDGMENT AS TO CERTAIN 1-F,  
1-I, AND 1-J ACCOUNTS**

TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,

Counter-Plaintiff,

v.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP;

Counter-Defendants.

Hearing Date: March 2, 2023

Hearing Time: 9:30 a.m.

1 **NOTICE OF HEARING ON HASELECT-MEDICAL RECEIVABLES LITIGATION**  
2 **FINANCE FUND INTERNATIONAL SP'S**  
3 **MOTION FOR PARTIAL SUMMARY JUDGMENT**

4 **NOTICE IS HEREBY GIVEN THAT** Plaintiff/Counter-Defendant HASElect-Medical  
5 Receivables Litigation Finance Fund International SP ("HASElect") filed its *Motion for Partial*  
6 *Summary Judgment as to certain 1-F, 1-I, and 1-J accounts* (the "Motion") on January 13, 2023.  
7 The Motion seeks the entry of an order determining the superior priority of HASElect's perfected  
8 security interest in certain of the accounts receivable that Tecumseh-Infinity Medical Receivables  
9 Fund, LP ("Tecumseh") claims to have acquired from Debtor Infinity Capital Management, Inc.  
10 ("Infinity" or "Debtor").

11 **NOTICE IS FURTHER GIVEN** that a hearing on the Motion will be held before a United  
12 States Bankruptcy Court Judge on **March 2, 2023 at 9:30 a.m.** at the U.S. Bankruptcy Court for  
13 the District of Nevada in the Foley Federal Building, 300 Las Vegas Blvd. South, Las Vegas,  
14 Nevada 89101.

15 **NOTICE IS FURTHER GIVEN** that any opposition to the Motion and the relief  
16 requested therein must be filed and served in accordance with Local Rule 9014(d)(1), which  
17 provides:

18 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading  
19 with the court. You *must* also serve your written response on the person who sent you this  
20 notice.

21 If you do not file a written response with the court, or if you do not serve your written  
22 response on the person who sent you this notice, then:

- 23 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- 24 • The court may rule *against you* without formally calling the matter at the hearing.

25 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Motion may be continued  
26 from time to time without further notice except for the announcement of any adjourned dates and  
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1 times at the above-noticed hearing or any adjournment thereof, and the court may approve  
2 modifications at the hearing or any continued hearing.

3 DATED this 13th day of January 2023.

4 **SHEA LARSEN**

5  
6 /s/ Bart K. Larsen, Esq.

Bart K. Larsen, Esq.

7 Kyle M. Wyant, Esq.

1731 Village Center Circle, Suite 150

8 Las Vegas, Nevada 89134

9 *Attorneys for HASelect-Medical Receivables*  
10 *Litigation Finance Fund International SP*

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**CERTIFICATE OF SERVICE**

1  
2 1. On January 13, 2023, I served the following document(s): **NOTICE OF HEARING ON**  
3 **PLAINTIFF HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE**  
4 **FUND INTERNATIONAL SP'S MOTION FOR PARTIAL SUMMARY**  
5 **JUDGMENT AS TO CERTAIN 1-F, 1-I, AND 1-J ACCOUNTS**

6 2. I served the above document(s) by the following means to the persons as listed below:

7 ☒ a. ECF System:

8 CLARISSE L. CRISOSTOMO on behalf of ROBERT E. ATKINSON  
9 [clarisse@nv-lawfirm.com](mailto:clarisse@nv-lawfirm.com), [bknotices@nv-lawfirm.com](mailto:bknotices@nv-lawfirm.com)

10 GERALD M GORDON on behalf of TECUMSEH-INFINITY MEDICAL  
11 RECEIVABLES FUND, LP  
12 [ggordon@gtg.legal](mailto:ggordon@gtg.legal), [bknotices@gtg.legal](mailto:bknotices@gtg.legal)

13 GABRIELLE A. HAMM on behalf of TECUMSEH-INFINITY MEDICAL  
14 RECEIVABLES FUND, LP  
15 [ghamm@Gtg.legal](mailto:ghamm@Gtg.legal), [bknotices@gtg.legal](mailto:bknotices@gtg.legal)

16 MICHAEL D. NAPOLI on behalf of TECUMSEH-INFINITY MEDICAL  
17 RECEIVABLES FUND, LP  
18 [michael.napoli@akerman.com](mailto:michael.napoli@akerman.com),  
19 [cindy.ferguson@akerman.com](mailto:cindy.ferguson@akerman.com); [catherine.kretzschmar@akerman.com](mailto:catherine.kretzschmar@akerman.com); [laura.taveras@akerman.com](mailto:laura.taveras@akerman.com);  
20 [an.com;masterdocketlit@akerman.com](mailto:an.com;masterdocketlit@akerman.com); [teresa.barrera@akerman.com](mailto:teresa.barrera@akerman.com)

21 ARIEL E. STERN on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES  
22 FUND, LP  
23 [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com), [akermanlas@akerman.com](mailto:akermanlas@akerman.com)

24 ☐ b. United States mail, postage fully prepaid:

25 ☐ c. Personal Service:

26 I personally delivered the document(s) to the persons at these addresses:

27 ☐ For a party represented by an attorney, delivery was made by handing the  
28 document(s) at the attorney's office with a clerk or other person in charge, or if no one is in  
charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handling the document(s) to the party or  
by leaving the document(s) at the person's dwelling house or usual place of abode with  
someone of suitable age and discretion residing there.

☐ d. By direct email (as opposed to through the ECF System):  
Based upon the written agreement of the parties to accept service by email or a court order,  
I caused the document(s) to be sent to the persons at the email addresses listed below. I did  
not receive, within a reasonable time after the transmission, any electronic message or other  
indication that the transmission was unsuccessful.

☐ e. By fax transmission:

Based upon the written agreement of the parties to accept service by fax transmission or a

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1 court order, I faxed the document(s) to the persons at the fax numbers listed below. No  
2 error was reported by the fax machine that I used. A copy of the record of the fax  
transmission is attached.

3 ☐ f. By messenger:

4 I served the document(s) by placing them in an envelope or package addressed to the  
persons at the addresses listed below and providing them to a messenger for service.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Dated: January 13, 2023.

7 By: /s/ Bart K. Larsen, Esq.

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